

From: [HarborComments](#)
To: [PortlandHarbor](#)
Subject: Comments on October 2018 Proposed Explanation of Significant Differences, Portland Harbor Superfund Site
Date: Friday, December 21, 2018 3:12:24 PM
Attachments: [image003.png](#)

From: Mat Cusma <mcusma@sch.n.com>
Sent: Thursday, December 20, 2018 1:34 PM
To: HarborComments <HarborComments@epa.gov>
Subject: Comments on October 2018 Proposed Explanation of Significant Differences, Portland Harbor Superfund Site

Dear EPA Region 10:

On behalf of Schnitzer Steel Industries, Inc. ("Schnitzer"), I write to comment on the October 2018 Proposed Explanation of Significant Differences ("Proposed ESD") for the Portland Harbor Superfund Site ("Site").

The stated purpose of the Proposed ESD is to document certain changes to the Selected Remedy as described in the January 2017 Record of Decision ("ROD") for the Site, including changes to the sediment cleanup levels and target tissue level for shellfish and for carcinogenic polycyclic aromatic hydrocarbons ("cPAHs") measured as benzo(a)pyrene equivalents ("BaPeq") and the remedial action level ("RAL") for total polycyclic aromatic hydrocarbons (PAHs) for areas of the Site outside of the Navigation Channel. As explained in the Proposed ESD, EPA's proposed changes are intended to incorporate the results of a January 2017 EPA updated study regarding the toxicological effects of BaP.

As EPA correctly notes at page 9 of the Proposed ESD, under EPA guidance, the updated cancer slope factor as determined in the 2017 toxicological study supersedes all other sources of toxicity information for conducting human health risk assessments under CERCLA. Moreover, given the significance for the Portland community of EPA's remedial decisions for the Site, it is critical that EPA's Selected Remedy be based on the most up-to-date, sound science and current data. The Selected Remedy should therefore be updated to reflect this new information.

For these reasons, Schnitzer agrees with EPA that the Selected Remedy should be revised to incorporate the results of the 2017 toxicological study as outlined in the Proposed ESD. Schnitzer also agrees that the ESD process is the appropriate procedure for implementing this change to the Selected Remedy.

Sincerely,

Mathew Cusma, P.E.

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